

FILED

DEC 20 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAVEN MULLINS,
HENRY BURCHETT,
CORTEZ TYREE

Defendants.

) INDICTMENT
)
)
)
)

CASE NO.

1 : 23 CR 00662

Title 18, United States Code,
Sections 922(g)(1) and 924(a)(8),
Title 21, United States Code,
Sections 841(a)(1), (b)(1)(C),
and 846

JUDGE CALABRESE

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,
21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about December 1, 2022 to on or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendants RAVEN MULLINS, HENRY BURCHETT, CORTEZ TYREE, and others, known and unknown to the Grand Jury, did knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

3. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant RAVEN MULLINS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Attempted Felonious Assault, a felony of the third degree, on or about February 23, 2010, in Case Number CR-09-528770-A; Robbery, a felony of the third degree, on or about August 8, 2011, in Case Number CR-11-549107-A; Burglary, a felony of the fourth degree, on or about August 8, 2011, in Case Number CR-11-549708-I; and Robbery with a firearm specification, a felony of the second degree, on or about December 20, 2011 in Case Number CR-11-554568-A, all in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce a firearm, to wit: a Taurus G3, 9 millimeter handgun, bearing serial number ABA253556, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 3

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

3. On or about December 6, 2023, in the Northern District of Ohio, Eastern Division, Defendant HENRY BURCHETT, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Receiving Stolen Property – Motor Vehicle, a felony of the fourth degree, on or about October 21, 2019, in Case Number CR-19-638889-A; Attempted Aggravated Burglary with Firearm Specification, a felony of the second degree, on or about September 25, 2017, in Case Number CR-17-616071-B, both

in the Cuyahoga County Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms, to wit: an Arminius, .38 Special revolver, bearing serial number 024516; a Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251; a Glock, Model 42, .380 caliber handgun, bearing serial number AEZY286; an American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126; a Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672; a Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 4 are incorporated herein by reference. As a result of the foregoing offenses, Defendants RAVEN MULLINS, HENRY BURCHETT, and CORTEZ TYREE, shall forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the drug violations charged herein; any and all property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the drug violations charged herein; and, any and all firearms and ammunition involved in or used in the commission of the firearm violation charged herein; including, but not limited to, the following:

- a. Taurus G3, 9 millimeter handgun, bearing serial number ABA253556;
- b. Arminius, .38 Special revolver, bearing serial number 024516;
- c. Glock, Model 22 Gen 4, .40 caliber handgun, bearing serial number BKKY251;

- d. Glock, Model 42, .380 caliber handgun, bearing serial number AEZY286;
- e. American Tactical, Model Omni Hybrid, multi-caliber rifle, bearing serial number NS132126;
- f. Stag Arms, Model Stag-15, multi-caliber rifle, bearing serial number S074672;
- g. Romarm/Cugir, Model Micro Draco, 762 caliber firearm, bearing serial number PMD-14888-19 RO.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.